

JOSEPH B. SALA, Ph.D.

1 contradict that, do you?

2 A. No, I -- I -- I'm not going to
3 contradict their testimony that they didn't see
4 warnings on the machine.

5 Q. You heard -- you read Rick
6 Sappington's deposition. I think he was the
7 maintenance supervisor?

8 A. Yes.

9 Q. He said he had been there 13 or 14
10 years and he had never seen a warning for that
11 shaft.

12 A. That's correct. I believe that's
13 consistent with that. I can go back and review
14 what he specifically said.

15 Q. What's your understanding as to
16 whether there were or were not warnings in the
17 area of this rotating shaft where Mr. Coggins
18 became entangled?

19 A. My understanding is that there is no
20 specific warning regarding the rotating shaft in
21 this area.

22 Q. What is your understanding as to any
23 warnings contained anywhere on that cooker?

24 A. I'm sorry, what --

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Exhibit 17